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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ESTATE OF JUAN H. CARRASCO by) and through its successor in interest and) representative, TERESA TORRES;) TERESA TORRES; L. CARRASCO,) J.H. CARRASCO, JR., S.) CARRASCO, minors by and through) their guardian ad litem, TERESA) TORRES,) Plaintiffs,) vs.) CITY OF SANTA ANA, et al.) Defendants.) AND ALL RELATED ACTIONS.)	Case No.: SACV 08-00981-JVS (RNBx) Consolidated with SACV 09-00097-JVS (RNBx) and SACV 09-00908-JVS (RNBx) [Proposed] PROTECTIVE ORDER
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THIS PROTECTIVE ORDER shall govern the disclosure of all personnel records and internal affairs records produced in discovery as ordered by this court in the lawsuit entitled Estate of Juan H. Carrasco, et al. v. City of Santa Ana, et al.

bearing case number SACV08-0981 JVS (RNBx), which has been consolidated with case numbers SACV 09-00097-JVS (RNBx) and SACV 09-00908-JVS (RNBx).

1. All personnel documents, internal affairs documents and all responses to interrogatories which pertain to the personnel and internal affairs documents produced by defense in discovery as ordered by the Court (hereinafter collectively “the Protected Documents”)¹, will be clearly designated prior to the disclosure or production of such Protected Documents, and will bear the notation of “Confidential” on each page. All Protected Documents shall be subject to this Protective Order as follows.

2. Each person receiving any of the Protected Documents shall not disclose to any person or entity, in any manner, including orally, any of the Protected Documents or any of the information contained therein, except when used for purposes of this litigation pursuant to this protective order.

3. The Protected Documents and all information contained therein, may only be disclosed to the following “qualified” persons:

(a) Counsel of record for the parties to this civil litigation;

(b) Plaintiffs and Defendant City of Santa Ana and its employees, including, but not limited to Chief Paul Walters, Officer Adrian Silva, Officer Matthew Lemmon, Corporal Ted Lucas, Officer Michael Judson and Officer Eric Majors;

(c) Paralegal, stenographic, clerical and secretarial personnel regularly employed by counsel referred to in subparagraph (a); and, investigators, expert witnesses and other persons legitimately involved in litigation-related activities for the counsel of record.

¹ Documents may qualify as Protected Documents only if they have not been made public.

1 (d) Court personnel, including stenographic reporters engaged in such
2 proceedings as are necessarily incidental to preparation for the trial of this action.

3 4. Protected Documents that a party intends to use in support of or in
4 opposition to a pre-trial filing with the Court must be filed in accordance with the
5 Central District of California Local Rules relating to under seal filings, including
6 Local Rule 79-5. Counsel intending to use information from Protected Documents
7 must both (a) submit unredacted documents containing information from Protected
8 Documents under seal and (b) file public versions of the same documents with the
9 information from Protected Documents redacted.

10 5. In the event this matter proceeds to trial, to the extent that any of the
11 Protected Documents are offered into evidence, those Protected Documents will
12 become public, unless sufficient cause is shown in advance of trial to proceed
13 otherwise.

14 6. The court reporter, videographer, and audiographer, if any, who
15 record all or part of the depositions in this matter of any City of Santa Ana
16 employee, including, but not limited to Chief Paul Walters, Officer Adrian Silva,
17 Officer Matthew Lemmon, Corporal Ted Lucas, Officer Michael Judson and
18 Officer Eric Majors, which include Protected Documents or descriptions thereof
19 shall be subject to this Order and precluded from providing any portions of the
20 original deposition videotape, audiotape, or exhibits which relate to the Protected
21 Documents or information to any persons other than counsel of record, absent
22 order of the court.

23 7. Those attending the depositions of any City of Santa Ana employee
24 including, but not limited to Chief Paul Walters, Officer Adrian Silva, Officer
25 Matthew Lemmon, Corporal Ted Lucas, Officer Michael Judson and Officer Eric
26 Majors, shall be bound by this Order and, therefore, shall not disclose to any
27 person or entity, in any manner, including orally, any statements relating to
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1 information within the Protected Documents made by such person during the
2 course of said depositions.

3 8. At any deposition of the any City of Santa Ana employee, should
4 there be persons in attendance who are not authorized to access to the Protected
5 Documents or information, such persons shall be removed from the deposition
6 room at any time information relating to the Protected Documents or protected
7 information is disclosed or discussed.

8 9. The Protected Documents shall be used solely in connection with the
9 preparation and trial of the within this action Estate of Juan H. Carrasco, et al. v.
10 City of Santa Ana, et al., bearing case number SACV08-0981 JVS (RNBx), which
11 has been consolidated with case numbers SACV 09-00097-JVS (RNBx) and
12 SACV 09-00908-JVS (RNBx), or any related appellate proceeding, and not for any
13 other purpose, including, without limitation, any other litigation or administrative
14 proceedings or any investigation related thereto.

15 10. Any party may move for a modification of this Order at any time.

16 11. This Order is made for the purpose of ensuring that the Protected
17 Documents and the information contained therein will remain confidential.

18 12. At the conclusion of this litigation, upon request of defense counsel,
19 plaintiff's counsel shall return all Protected Documents to Steven J. Rothans, Esq.,
20 Carpenter, Rothans & Dumont, 888 S. Figueora Street, Suite 1960, Los Angeles,
21 California 90017.

22 IT IS SO ORDERED.

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24 DATED: May 6, 2010



25 Honorable Robert N. Block
26 United States District Court
27 Magistrate Judge
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